

THOMAS A. JOHNSON, #119203
Law Office of Thomas A. Johnson
400 Capitol Mall, Suite 2560
Sacramento, California 95814
Telephone: (916) 422-4022
Email: taj@tomjohnsonlaw.com

Attorney for JAMES MECHAM

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,)	Case No.: 2:22-cr-00161-JAM
Plaintiff,)	
vs.)	STIPULATION AND ORDER TO
)	CONTINUE STATUS CONFERENCE
)	Date: June 18, 2024
)	Time: 9:00 a.m.
JAMES MECHAM, KURT STOCKS, and)	Judge: Hon. Judge John A. Mendez
HEIDI EDWARD,)	
Defendants)	

STIPULATION

Plaintiff United States of America, by and through its attorney of record, Assistant United States Attorney HEIKO COPPOLA, and defendant JAMES MECHAM, both individually and by and through his counsel of record, Thomas A. Johnson, defendant KURT STOCKS, both individually and by and through his counsel of record, Malcolm S. Segal, and defendant HEIDI EDWARDS, both individually and by and through her counsel of record, Christina Sinha, hereby stipulate as follows:

1. By previous order, the status conference as to all defendants in this matter was continued to June 18, 2024. ECF No. 48

2. With the instant stipulation, the defendants now seek to continue the status conference to **September 10, 2024, at 09:00 a.m.**, and to exclude time under Local Code T-4 from June 18, 2024 through September 10, 2024.
3. This case is a complex matter with discovery in excess of 51,000 pages. It involves the investigation of twenty separate entities in an alleged money laundering scheme. It includes the seizure of over 17 separate bank accounts at 12 separate financial institutions. It involves the tracing of funds through 17 financial institutions over a period of 7 years. In U.S. District Court Case No. 2:18-mc-00013-WBS-AC are related civil forfeiture allegations involving 6 accounts with currency and 3 pieces of physical property. There are Lis Pendens (ECF No. 36-40) on five separate pieces of real property. There is property located both in California and Arizona and there is a need to continue to research the law and continue to investigate. While the parties are making efforts of resolution, the amount of funds seized combined with voluminous discovery means the case needs additional preparation. Counsel believes that a failure to grant the requested continuance would deny them from reasonable time necessary for effective preparation, taking into account the exercise of due diligence.
4. The government does not object to the continuance.
5. Therefore, the parties stipulate that the ends of justice served by granting the continuance outweighs the best interest of the public and all defendants in a speedy trial, and respectfully request the Court so to find. For the purpose of computing time under 18 U.S.C. § 3161 et seq. (the Speedy Trial Act), the parties request that the time period between June 18, 2024 and September 10, 2024 (inclusive) be deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(B)(iv) (Local Code T4), because it would result from a continuance granted by the Court at the defense's request, based on a finding that the ends of justice served by granting the continuance outweighs the best interest of the public and all defendants in a speedy trial.

6. The parties therefore respectfully request this Court to adopt the parties' stipulation, detailed above, in full as its Order.

IT IS SO STIPULATED.

DATED: June 11, 2024

PHILLIP A. TALBERT
United States Attorney

/s/ Heiko Coppola
HEIKO COPPOLA
Assistant U.S. Attorney

DATE: June 11, 2024

/s/ Thomas A. Johnson
THOMAS A. JOHNSON
Attorney for James Mecham

DATE: June 11, 2024

/s/ Malcolm S. Segal
MALCOLM S. SEGAL
Attorney for Kurt Stocks

DATE: June 11, 2024

/s/ Christina Sinha
CHRISTINA SINHA
Attorney for Heidi Edwards

ORDER

IT IS SO ORDERED.

Dated: June 11, 2024

/s/ John A. Mendez
THE HONORABLE JOHN A. MENDEZ
SENIOR UNITED STATES DISTRICT JUDGE